

Many more  
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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
IN AND FOR THE COCHISE OF COUNTY

STATE OF ARIZONA,

Plaintiff,

vs.

LONNEY McCOY,

Defendant,

NO. CR201800462

STATE'S RULE FIFTEEN  
DISCLOSURE AND REQUEST FOR  
DISCLOSURE

COMES NOW the State of Arizona, by and through the Cochise County Attorney, BRIAN M. McINTYRE and pursuant to Rule 15 of the Arizona Rules of Criminal Procedure, hereby makes the following available to the Defense for examination and reproduction.

1. The following witnesses may be called to testify at trial:

NAME:

ADDRESS

Ofc. Papatrefone  
Ofc. Van Wesep  
Det. Festa  
Bank of America  
Deborah Charbonneau  
David Vlasic  
Vivina Reid  
Kelly Janney  
Taylor Voegeli  
Ginger Shreve  
Eva Marie Morales

c/o Amelia Urrea  
deceased  
victim  
deceased  
1124 Sahuaro Dr, SV  
5448 S. San Pedro Ave, SV  
500 E. Fry Blvd L13, SV  
5521 S. Santa Claus Ave, SV

als listed in materials disclosed by the state  
ed or to be disclosed by Defendant(s) and any co-Defendant(s).

1 All witnesses may express expert opinions based on their training and experience.

2 2. The State will use any of the defendant's statements, whether to law enforcement  
3 officers or otherwise, which are contained in any reports.

4 3. The names and addresses of experts who have personally examined the defendant or  
5 any evidence in the particular case, together with the results of physical examinations  
6 and or scientific tests, experiments, or comparisons, including all written reports or  
statements made by them in connection with the particular case are as follows:

<u>NAME</u>	<u>ADDRESS</u>	<u>STATEMENTS</u>
7 Unknown at this time.		

8 4. A list of all papers, documents, photographs or tangible objects which the State will  
9 use at trial are: videos, photographs, if any exist.

10 **REPORTS:**

**PAGE(S):**

11 Indictment	1-3
12 SVPD DR 17-45273 Officer Report	4-22
13 SVPD DR18-11825 Officer Report	23-28
14 SVPD DR18-11825 sup #1	29
15 SVPD DR18-11825 sup #2	30
16 SVPD DR18-11825 P.C Statement/Arrest / Booking Sheet	31-33
17 SVPD DR18-11825 Evidence Report	34
18 Copies of Checks	35-38
19 A DOT image of deceased	39

20 All exhibits disclosed or to be disclosed by Defendant or any co-Defendant(s).

21 In addition, the State will use any items listed in or referred to in the Indictment,  
22 and Grand Jury transcript, or in the Information and Preliminary Hearing Transcript.

23 5. A list of all prior felony convictions of the defendant which the prosecutor may use at  
24 trial are as follows:

25 **PRIOR FELONY CONVICTIONS:**

Unknown at this time.

6. A list of all "other crimes, wrongs or acts" of the defendants which the prosecutor may  
use to prove intent, or knowledge or otherwise use at trial, are as follows:

**OTHER ACTS:**

**PAGES:**

Unknown at this time.

- 1 7. A list of material or information which tends to mitigate or negate the defendant's  
2 guilt as to the offense charged, or would tend to reduce his punishment therefore,  
3 including all prior felony convictions of witnesses whom the prosecutor expects to  
call at trial, are as follows:

4 **LIST OF MATERIALS:**

**PAGES:**

Unknown at this time.

- 5 8. Collateral Issues. The State will use evidence obtained from, or as a result of, the  
6 following:

- 7       ☐ Electronic Surveillance  
8       ☐ Search Warrant  
9       ☐ Informer

The above disclosure materials are marked as pages 1-39 inclusive.

10 **The following plea bargain is offered: N/A**

11 The State hereby requests, pursuant to Rule 15.2, that the Defendant provide:

- 12 1) Notice of defense as to which the Defendant intends to offer evidence at trial,  
13 including, but not limited to, alibi, insanity, self-defense, defense of others,  
14 entrapment, impotency, marriage, insufficiency of a prior conviction, mistaken  
15 identity, and good character. The notice shall specify for each listed defense the  
16 persons, including the defendant, whom the defendant intends to call as witnesses at  
17 trial in support of each listed defense.
- 18 2) The names and addresses of all persons, other than that of the defendant, whom the  
19 defendant intends to call as witnesses at trial, together with their relevant written or  
20 recorded statements;
- 21 3) The names and addresses of experts whom the defendant intends to call at trial,  
22 together with the results of the defendant's physical examinations and of scientific  
23 tests, experiments or comparisons that have been completed; and  
24  
25

1 4) A list of all papers, documents, photographs and other tangible objects that the  
2 defendant intends to use at trial.

3 The State further requests, pursuant to Rule 613, Ariz.R.Evid. the following:

4 1) Any and all evidence the Defendant intends to use at trial to impeach a witness.

5 The State requests that the requested disclosure be made within the time limits proscribed in  
6 Rule 15.2(d).  
7

8  
9 *If there are non-paper items they will be made available for copying, the*  
10 *copying to be done by the defense. The copying will be done at the County Attorney's Office*  
11 *by the defense attorney/staffing. The defense will be required to provide their own blank tapes*  
12 *and CD's, and their own recorders, computers, etc., with which to make copies.*

13 RESPECTFULLY submitted this 14<sup>th</sup> day of May 2018.

14 COCHISE COUNTY ATTORNEY

15 BY: 

16 BY: MICHEL A. POWELL  
17 Deputy County Attorney

18 Copies of the foregoing  
19 mailed/delivered this 14  
20 day of May 2018 to:

21 P. Kelly - Jm  
22 3-1-19  
23 By: J.S.  
24 Legal Secretary  
25